April 10, 2025

Federal Communications Commission

GN Docket No.: 25–133
Comment Date: April 11, 2025

To whom it may concern:

I write regarding the Commission's notice of proposed action and request for comment. My comments are specifically regarding the amateur radio service, Part 97.

(1) The frequencies and bands allocated to the amateur radio service generally must be maintained.

47 CFR § 97.301 authorizes specific frequencies to the amateur radio service. These frequencies are also governed by the ITU. These HF, VHF, and UHF frequencies are essential to the operations of the amateur radio service, including hobbyist use, essential everyday communication for rural Americans, and the many emergency management and communications programs that regularly serve communities during some of the most significant natural disasters and other emergency situations that interrupt traditional communication networks.

The integrity and protection of the radio frequency bands allocated to the amateur radio service must remain as they are. Any reduction in the protections offered to these amateur radio service bands will have significant detrimental effects on the American public at large, even those who do not themselves operate amateur radio stations.

(2) The licensure structure for the amateur radio service should be simplified.

Although the RF band space allocated to the amateur radio service must be maintained in general, the variation between various license classes within the amateur radio service presents unnecessary complications and difficulty.

It is my recommendation that the Technician class license be maintained as-is, but the General and Extra license classes should be combined into a single license class with all the frequency privileges of the current Extra class license. A test for this new license classes should represent a greater knowledge test than the current General license, maintaining the importance of an upper license class but reducing the barrier to entry to the complete band allocations of the amateur radio service. The complexity of the current licensure system—while intended to protect the integrity of the amateur radio service—serves to overcomplicate the use of the service.

Sincerely,

Kyle Neuner
KF0TQE